

# Exhibit E

**BERNABEI & WACHTEL, PLLC**

ATTORNEYS AT LAW

1775 T STREET, N.W.  
WASHINGTON, D.C. 20009

202.745.1942

FAX: 202.745.2627

[WWW.BERNABEIPLLC.COM](http://WWW.BERNABEIPLLC.COM)

LYNNE BERNABEI  
DAVID WACHTEL  
ALAN R. KABAT

PETER M. WHELAN  
ELIZA BRINK DERMODY  
LAUREN R. S. MENDONSA ▲  
NADIA E. SAID ■

▲ ADMITTED IN VA ONLY

■ ADMITTED IN IL ONLY

By Electronic Mail and First Class Mail  
February 28, 2013

Robert T. Haefele, Esquire  
Michael Elsner, Esquire  
Motley Rice, LLC  
28 Bridgeside Boulevard  
Mount Pleasant, S.C. 29464

Re: In re Terrorist Attacks on September 11, 2001, No. 1:03-MD-1570 (GBD/FM).

Dear Counsel:

I write on behalf of Perouz Sedaghaty, and in response to the Order (ECF No. 2692) (Feb. 22, 2013). Mr. Sedaghaty, at the direction of his criminal defense counsel, continues to assert the Fifth Amendment privilege in response to plaintiffs' document requests, and hence will not be submitting a privilege log at this time.

Sincerely,

*/s/ Alan R. Kabat*

Alan R. Kabat

cc: MDL-1570 Counsel of Record  
Steven Wax, Esquire